

**Ferhut, Faridoon**

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**From:** Lestercorn@aol.com**Sent:** Friday, March 03, 2006 3:10 PM

**To:** Ferhut, Faridoon; phawker1@san.rr.com; Elwood.Holly@epamail.epa.gov; lois@wastediversion.org; axhasp@rit.edu; phyllis@rechargermag.com; monica@rechargermag.com; darmanino@co.marin.ca.us; RachelBalsley@stopwaste.org; rbwaite@hds.co.contra-costa.ca.us; jbschetsrieder@santa-clarita.com; karl-bruskotter@santa-monica.org; KFoley@sjcehd.com; ctranby@mailbox.lacity.org; gpayba@mailbox.lacity.org; aheil@lacsds.org; julie.weiss@cityofpaloalto.org; katz.john@epa.gov; elizabeth.constantino@pln.sccgov.org; JenniferK@abag.ca.gov; skip.lacaze@ci.sj.ca.us; sally.lopez@ci.fresno.ca.us; karilyn.merlos@sdcounty.ca.gov; MPride@dtsc.ca.gov; debbie.rafael@sfgov.org; levan@recycledproducts.org; terri.thomas@mail.co.ventura.ca.us; gwatts@toaks.org; khiggins@gsd.lacity.org; aweissman@greenseal.org; dan.l.miller@hp.com; maprea@apreacompany.com; kristine.berman@hp.com; scott.canonico@hp.com; mrufino@cusa.canon.com; ehunter@cawrecycles.org; marcia.deegler@osd.state.ma.us; pbrewer@lexmark.com; rgiuntini@reman.org; tricia@i-itc.org; everol.smith@xerox.com; victor.berko-boateng@xerox.com; michael.spencer@xerox.com; drees@laserrechargeaz.com; mark.sedlacek@ladwp.com; gbrown@lawa.org; dean.shulman@brother.com; naomi@newdream.org; kritchier@scscertified.com; scott@productstewardship.us; amyperl@post.harvard.edu; yfischer@ptiimaging.com; karen.hamilton@metrokc.gov; brianm@prestongates.com; h.evans@cox.net; gerbin@nmgovlaw.com; kimuraN@us.panasonic.com; vernamr@us.panasonic.com; anne.stocum@xerox.com; val.amezquita@ladwp.com; itaru.sato@sharpusa.com; shelby\_houston@ea.epson.com; jvoorhes@cartridgeworld.com; sherry@aaaei.com; amberd@ilgweb.com; gordon@dati.ca.com; jlovecchio@advancedlaserproducts.com; info@americantransitech.com; keysel@aristadoes.com; tera@guybrown.com; PacCopier@aol.com; sandra.cannon@pnl.gov; daniel.burgoyne@dgs.ca.gov; rita.hamilton@dgs.ca.gov; marnell.voss@dgs.ca.gov; eckl@sbcglobal.net; Hiroko.Kurosawa@dgs.ca.gov; Craig.duehring@dgs.ca.gov; exec@i-itc.org; nzneie@rit.edu

**Cc:** Hart, Jerry; Orr, Bill**Subject:** Re: EPP Standard for Printer & Duplication Cartridges - UPDATE

Dear Mr. Ferhut:

Please post my previously e mailed comments on the website. Some of the cartridge definitions are incorrect and some are biased with no basis in fact. I also think that the standard is set too low to achieve 100 points. If 10% recycled plastic is sufficient to reach 100 points then why isn't a 50% level or even higher preferable? These are not paper products. Printer cartridges are complex mechanisms with some materials that cannot be recycled, such as thermoset plastics.

Melt-down recycling is the last thing in the environmental impact hierarchy that should be done. Successful reuse should be the step before recycling. This extends the energy expended to make the product in the first place. Melt-down recycling of complex products is a last resort. One would not melt down a car after it ran out of gas and still be considered rational. To give such credence to recapture and melt-down efforts is to endorse a consumable business model and not an environmental impact improvement.

It seems as if every OEM company will qualify for this EPP evaluation as discussed at the first meeting. If that is so, then what has been accomplished?

The previous comment that component reuse is of no value when technology exists to qualify components for reuse, engineered by the Rochester Institute of Technology, seems inconsistent with the environmental impact value of reuse. I think that there should be a sliding scale in the point system to create incentive to improve environmental impact. A one hundred point score should be considered a bare minimum. The ability to score higher will create competition to make products better for the environment.

In order to create a rating system we must first agree on an environmental impact hierarchy, or preferred designs. A rating system based on an environmental impact hierarchy for a product's lifecycle is a worthwhile pursuit. It is already understood by most environmental agencies. I agree with HP's letter; this should not be rushed with deadlines for the sake of deadlines. There is much to consider.

If the OEMs would like to include quality considerations, then this is a different problem than an EPP. Either the marketplace will decide what is acceptable, or the OEMs need to provide much more information than just yield. If there is to be a comparison then much more information must be revealed or no such comparison can be made. To date, no OEM provides more than stated yield and they do not even use the same test methods. There are other quality considerations that are important.

I think the quality issue is best left up to the purchaser. STMC certified companies have objective test methods for performance. If this EPP effort gets bogged down in quality arguments between remanufacturers and OEMs, it will get nowhere. This effort is about the environmental impact and not about quality comparisons. If the quality of either an OEM cartridge, or a remanufacturer's cartridge is not acceptable, they will be eliminated by lack of demand.

Sincerely,

Lester Cornelius  
Chairman, International Imaging Technology Council  
President, Remanufacturing Industry Council  
Chairman, Standardized Test Methods Committee